

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited in view of the foregoing amendments and the following remarks.

Claims 1, 2, 4 through 7, 9, 10, and 69 are pending, with Claims 1, 9, and 10 being independent. Claim 8 has been cancelled. Claims 1, 4, 9, and 10 have been amended.

According to the Office Action, all of claims are rejected under as being unpatentable under 35 U.S.C. § 103 over the patent to Wolff (U.S. 6,209,048) in view of the patent to Dan, et al. (US 6,560,639). This rejection is respectfully traversed for the following reasons.

Independent Claim 1 relates to an information processing apparatus for submitting document information including a plurality of images via a network. The apparatus comprises an image pickup unit, a schedule setting unit adapted to set, in advance, an image pickup position and a image pickup time of the image pickup unit as schedule information and store the schedule information in a memory, an image storage unit adapted to store an image which is obtained by the image pickup unit in accordance with the schedule information stored in the memory, a designation unit for designating an image among the plurality of images in the document information, to be replaced with an image newly stored in the image storage unit, and a document creation unit adapted to create new document information by substituting the designated image in the document information by the image stored in the image storage unit.

By this arrangement, document information can be automatically updated by substituting a designated image in the document information, by a stored image obtained in accordance with schedule information set in advance that includes an image pickup position and an image pickup time of an image pickup unit.

In contrast, the patents to Wolff and Dan, et al. are not understood to disclose or suggest a schedule setting unit adapted to set, in advance, an image pickup position and a image pickup time of the image pickup unit as schedule information and store the schedule information in a memory, as recited by amended Claim 1. Therefore, these patents are also not understood to disclose or suggest an image storage unit adapted to store an image which is obtained by the image pickup unit in accordance with the schedule information stored in the memory, as also recited by amended Claim 1. As a result, these patents are also not understood to disclose or suggest a designation unit for designating an image among the plurality of images in the document information, to be replaced with an image newly stored in the image storage unit, or a document creation unit adapted to create new document information by substituting the designated image in the document information by the image stored in the image storage unit, as also recited by amended Claim 1.

Since MPEP § 2142 requires the cited art to disclose or suggest all the claimed features to establish a prima facie case of obviousness, and since, here, the patents to Wolff and Dan, et al. are not understood to disclose or suggest at least four features of amended Claim 1, Applicants submit that the Office has not yet established a prima facie case of obviousness against amended Claim 1. For this reason, Applicants respectfully request that the rejection of Claim 1 be withdrawn. And since independent Claims 9 and 10 are, respectively, corresponding method and storage-medium claims, Applicants submit that these claims are allowable for corresponding reasons.

Furthermore, Applicants respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the

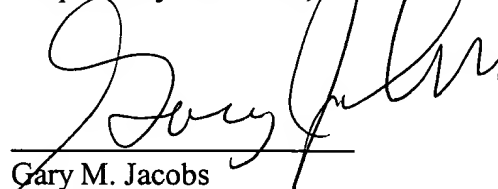
art to arrive at the above-discussed combinations of claimed features. Therefore, the motivation-to-combine criteria of MPEP § 2142 has also not yet been satisfied with respect to amended independent Claims 1, 9, and 10.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. For example, Claim 69 recites displaying in combination with the above-discussed substituting, which combination is respectfully submitted not to be disclosed or suggested by Igarashi, et al. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

In view of the above amendments and remarks, the application is now in allowable form. Therefore, early passage to issue is respectfully solicited.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary M. Jacobs", is written over a horizontal line.

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